UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No.: 22-20104-CR-BECERRA

UNITED STATES OF AMERICA,

VS.

WALTER VEINTEMILLA.

Defendant.

DEFENDANT VEINTEMILLA'S MOTION TO UNSEAL

COMES NOW, the Defendant, Walter Veintemilla, by and through the undersigned counsel, and pursuant to the Court's Order of May 8, 2025 (DE 1053) instructing counsel to review sealed pleadings to determine which should be unsealed and made part of the public record, respectfully requests that the following sealed docket entries be unsealed and be made part of the public record, and in support thereof states:

- 1. The Court entered a Standing Order on Sealed Filings on December 3, 2024 (DE 940).
- 2. In view of this order, and in an abundance of caution, several of Defendant Veintemilla's subsequent filings were made under seal.
- 3. The docket entries listed below were filed under seal and need not remain under seal.
 - 4. The entries listed below are appropriate for inclusion in the public record.
 - (DE 991) Veintemilla's Reply to Response to the March 13, 2025 Order;
 - (**DE 1005**) Joint Response to Notice Concerning April 3, 2025 Discovery Conference;
- (**DE 1031**) Veintemilla's Ex-Parte Motion for Order Directing the Jail to Provide Regular Access to Laptop and Notice Regarding Visibility of 3500 Materials.

WHEREFORE, for the reasons set forth herein, the undersigned respectfully request that the Court issue an order directing the Clerk to unseal Docket Entry No.'s 991, 1005, and 1031, making them a part of the public record, and for all other and further relief deemed just and proper.

Dated: May 9, 2025 Respectfully submitted,

KUDMAN TRACHTEN ALOE POSNER, LLP

Tama Beth Kudman, Esq. 7108 Fairway Drive, Suite 130 Palm Beach Gardens, Florida 33418

Tel: (561) 472-0811; Facsimile: (561) 828-0210 Florida Bar No. 637432 tkudman@kudmanlaw.com

By: /s/ Tama Kudman

TACHE, BRONIS AND DESCALZO, P.A.

Marissel Descalzo, Esq 150 S.E. 2nd Avenue, Suite 600

Miami, Florida 33131
Telephone: (305) 537-9565
Facsimile: (305) 537-9567
Florida Bar No. 669318
mdescalzo@tachebronis.com
service@tachebronis.com

By: /s/ Marissel Descalzo

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the forgoing was filed electronically via CM/ECF and was served electronically to all counsel of record on May 9, 2025.

By: /s/ Tama Kudman